

EXHIBIT A

Sworn Declaration

1. My name is [REDACTED]. I am over 18 years old and legally competent to testify.
2. I currently work at Maid-Rite where I have worked for more than 10 years. I work packing different types of meats for sale to customers.
3. I contacted Justice at Work about the way Maid-Rite has responded to the Coronavirus crisis and the dangerous conditions at the workplace. I asked them to file a complaint with OSHA on my behalf.
4. I told my lawyers at Justice at Work that I cannot be part of any action if I have to share my name.
5. After the complaint to OSHA was filed, I submitted an anonymous declaration about what is happening at Maid-Rite to help with any investigation.
6. I am fearful for my health and want things at Maid-Rite to change, but I am very worried about what Maid-Rite would do to me if they found out that I had made a complaint to OSHA and that I am continuing in this mandamus action.
7. I believe that if Maid-Rite finds out they will fire me.
8. In the past, anyone who has made a complaint about anything to Maid-Rite has been harassed by the human resources department.
9. Anything you do that Maid-Rite considers slightly out of line can get you fired.
10. I believe that even if some time passes and Maid-Rite later finds out I complained, I would be fired.
11. After Justice at Work submitted the complaint to OSHA on my behalf, I heard from another worker that Maid-Rite was trying to verify who made the complaint against them.
12. When I heard this, I did not say anything at all because I do not want anyone to know that I am involved.
13. If I cannot be anonymous I cannot move forward with this case and will have to withdraw.

I, [REDACTED], declare under penalty of perjury that the foregoing is true and correct.

Yo, [REDACTED] declaro debajo castigo de perjurio que lo anterior es verdad y correcto.

[REDACTED]


Signature

7/16/20

Date

CERTIFICATE OF TRANSLATION

I, Lerae Kroon, certify that I am competent in both Spanish and in English. I translated the attached Sworn Declaration from English into Spanish and provided a written copy to [REDACTED] [REDACTED] for her review before her signature. I certify that the Spanish translation was a complete and accurate translation thereof.



Signature

July 21, 2020

Date

Justice at Work
5907 Penn Avenue Suite 320
Pittsburgh, PA 15206

EXHIBIT B

Sworn Declaration

1. My name is [REDACTED] I am an employee of Maid-Rite Specialty Foods, where I have worked for more than 10 years.
2. I filed an anonymous imminent danger complaint with the Occupational Safety and Health Administration (“OSHA”) against Maid-Rite Specialty Foods on May 19, 2020. I am now a petitioner in a mandamus action against OSHA, in an attempt to get OSHA to protect me in my workplace.
3. I did not reveal my name in the imminent danger complaint, and I do not want to reveal my name in the litigation with OSHA. I have made very clear to my attorneys that under no circumstances do I want my name revealed or connected to these legal actions.
4. I am afraid that if I reveal my name, Maid-Rite will retaliate against me.
5. I know it would be illegal for Maid-Rite to fire me for complaining, but I do not trust them because I have seen Maid-Rite retaliate against numerous workers when they have made legal complaints in the past.
6. Most recently, a woman had a back injury that caused her pain at work. She asked the company to change her job, and at some point she hired a lawyer to help her. I believe she filed some kind of legal action. She was fired soon after. The company made up some excuse, but it was clear to me she was fired because she made a complaint.
7. Many of the people I have seen fired for complaining had taken some legal action after being injured at work.
8. Maid-Rite makes up reasons for disciplining workers all the time. Maid-Rite has done this to me. I do not want to give the details of this incident because it would allow Maid-Rite to identify me.
9. If Maid-Rite retaliated by firing me, I would be unable to find a job. I am in my mid-50s and we are in the middle of a pandemic. If I lost this job, I would not be able to support myself or my family. I do not know what I would do.
10. If I am unable to be anonymous in the lawsuit, I will have no choice but to withdraw from it.

I [REDACTED] declare under penalty of perjury that the foregoing is true and correct.

Yo, [REDACTED], declaro debajo castigo de perjurio que lo anterior es verdad y correcto.

[REDACTED]

Firma / Signature

7/21/2020

Fecha / Date

CERTIFICATE OF TRANSLATION

I, Samuel Datlof, Esq., certify that I am competent in both Spanish and English. I orally translated the attached Sworn Declaration from English into Spanish for [REDACTED] before she signed it, and certify that it was a complete and accurate translation thereof.


Signature

7/22/20
Date

Justice at Work
990 Spring Garden Street, Suite 300
Philadelphia, PA 19123

EXHIBIT C

Sworn Declaration

1. I am over 18 years old and legally competent to testify.
2. I currently work at Maid-Rite where I pack hamburger meat.
3. I contacted Justice at Work because I feared for my safety and health in the workplace. I contracted Covid and I believe I got it while working at Maid Rite.
4. I joined the OSHA complaint after it had been submitted and told my attorney that I do not want to share my name. I understand that my attorney told OSHA that I wished to join anonymously.
5. To try to help with the investigation, I submitted an anonymous declaration to OSHA with the assistance of my attorney.
6. I do not want to share my name at any point in the case because I am afraid that if Maid Rite learns my name that they will fire me.
7. Maid Rite is very strict with its workers. They have a point system for disciplining employees. If you reach a certain number of points, they fire you.
8. Maid Rite gives employees points for anything, even calling in sick or arriving late because of doctor's appointments. I don't think Maid Rite has changed its policy during the Covid crisis.
9. Because Maid Rite is so strict, I believe they will fire me if they learn that I am helping with the investigation. I have to support myself and my family, and I cannot risk losing a job, especially during this time when so many people are unemployed.
10. I cannot move forward with this case if I have to share my name.

I, [REDACTED] declare under penalty of perjury that the foregoing is true and correct.

Yo, [REDACTED] declaro debajo castigo de perjurio que lo anterior es verdad y correcto.

[REDACTED]
Signature

7-16-20
Date

CERTIFICATE OF TRANSLATION

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Date

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